



FINTELEGRAM COMPLIANCE INTELLIGENCE

# Nylo Migration Report

## From Lithuania to Poland to Georgia

The utPay → ChainValley → Nylo regulatory migration pattern behind EU-facing offshore casino deposits

*Betify tested case: Neteller/Skrill-labelled deposits routed into Nylo exchange orders after MiCA Day One*

### EXECUTIVE THESIS

This is no longer merely a Nylo story. It is a regulatory migration story: Lithuania → Poland → Georgia; utPay → ChainValley → Nylo; changing legal entities and jurisdictions while a materially similar casino-facing crypto-conversion function appears to survive. FinTelegram assesses functional succession as strongly supported, operational or infrastructure continuity as a strong hypothesis, and common ownership or control as unproven.

Field	Detail
Document class	Focused compliance intelligence report — revised publication-ready basis
Core subject	Nylo LLC (Georgia) and the alleged migration of casino crypto-conversion rails from UAB Utrg/utPay (Lithuania) through ChainValley (Poland) to Nylo (Georgia)
Tested case	Betify — July 2026 Neteller and Skrill-labelled deposit flows routed to app.nylo.pro “Exchange order” pages
Prepared by	FinTelegram News — Cyberfinance Intelligence & Compliance Desk
Intended audience	EU and Georgian regulators; AML/CFT authorities; gambling supervisors; Paysafe compliance; banks, acquirers, EMIs, PIs and CASPs
Date / version	8 July 2026 — Version 2.0
Evidence standard	Established Fact / Strong Indicator / Strong Hypothesis / Open Question
Legal note	This report analyses regulatory and compliance risk. It does not allege fraud, money laundering, illegal gambling facilitation or other criminal conduct by any named person or entity. Common ownership of utPay, ChainValley and Nylo is not established.

### Editorial definition — “fake-FIAT rail”

FinTelegram uses this as an analytical label for a user journey presented through familiar fiat or e-wallet payment methods while the underlying transaction is converted into a crypto purchase and onward transfer. It is not a statutory legal term and does not itself imply criminality.



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## 1. Executive Assessment

**The central conclusion.** FinTelegram’s accumulated evidence now supports a stronger and more precise proposition than the earlier “Nylo Switch” question. Nylo appears to have replaced ChainValley as the merchant-integrated crypto-conversion node in overlapping offshore-casino cashier environments, preserving materially the same user journey, wallet-brand wrappers, exchange-order logic and buy-crypto consent language previously documented in the ChainValley and utPay eras. The evidence does not establish common ownership or control. It does, however, go materially beyond superficial similarity.

**The regulatory migration logic.** The sequence is economically coherent. Lithuania’s national MiCA transition ended on 31 December 2025; utPay’s own terms state that its crypto-related services were suspended pending the authorisations required to provide them. Poland offered eligible pre-existing providers a longer Article 143(3) transitional runway until 1 July 2026; primary UTOrg documents identify Chain Valley as a third-party crypto-purchase service provider in the UTOrg product environment. Nylo then emerged in a Georgian Free Zone, outside the EU establishment perimeter, while the casino-facing transaction pattern persisted. [P6] [P7] [P8] [P9]

**The July 2026 live evidence.** In the tested Betify journeys, selecting Neteller or Skrill led to app.nylo.pro. The page was labelled “Exchange order,” displayed EUR 20 and the selected wallet brand, and required consent to “buy crypto and send it to the specified address.” In the Neteller variant, the user also accepted the Terms of Use and Privacy Policy of the “Executing Service Provider.” FinTelegram followed the legal links presented in the checkout and found that Terms, Privacy and AML/KYC links led to Nylo’s own policies. [E1] [E2] [E3]

**The immediate compliance consequence.** The key question is no longer simply “who is the unidentified executing provider?” Nylo itself is the user-facing legal-policy endpoint attached to the exchange-order journey. If Nylo is the executing provider, its precise regulated function requires explanation. If another entity performs the backend conversion or transfer, that entity’s role, authorisation and disclosure remain opaque.

**The post-MiCA question.** ESMA’s 23 June 2026 statement expects unauthorised CASPs to wind down EU activity after the 1 July deadline, including stopping new EU onboarding and solicitation. ESMA’s reverse-solicitation guidelines require the client’s “own exclusive initiative” to be construed narrowly and warn against redirection to third-country crypto services. A casino cashier routing a user into a Georgian exchange order therefore creates a serious perimeter question, even though only a supervisor or court can determine whether Nylo’s exact role falls within MiCA. [P11] [P12] [P14]

### FINTELEGRAM ASSESSMENT

Functional succession is strongly supported. Operational or infrastructure continuity is a strong, testable hypothesis. Common ownership, UBO overlap and shared control remain unproven. The report therefore separates those propositions rather than weakening the entire succession thesis merely because ownership evidence is still missing.

Proposition	Assessment	Reason
Functional succession	STRONGLY SUPPORTED	Nylo occupies a materially similar casino cashier function to ChainValley and earlier utPay, with overlapping merchant environments, wallet wrappers and exchange-order logic.
Operational / infrastructure continuity	STRONG HYPOTHESIS	Repeated consent wording, transaction logic, domain architecture, sequential timing and casino cohort overlap justify investigation of shared technology, merchant contracts or migration support.
Common ownership / control	UNPROVEN	No public record reviewed establishes identical UBOs, shareholders or control across the three generations.
MiCA breach by Nylo	OPEN LEGAL / SUPERVISORY QUESTION	The observed flow raises a serious territorial-perimeter and reverse-solicitation issue; the exact legal characterisation depends on Nylo’s role and any backend provider.
Nylo NBG VASP registration	OPEN QUESTION	No registration number is displayed in the reviewed Nylo materials. This report does not state that Nylo is unregistered; authoritative register confirmation is required.



## 2. Revision Note: What Version 2.0 Changes

Version 2.0 is not a cosmetic rewrite. It restructures the report around regulatory migration rather than a stand-alone Nylo profile and corrects several evidentiary and legal overstatements in Version 1.0. The principal changes are set out below.

Revision	Version 2.0 treatment
<b>July screenshots now verified</b>	The prior editorial verification note is removed. The two July screenshots are available and reviewed.
<b>Executing Service Provider finding updated</b>	The report now records that checkout legal links lead to Nylo's own Terms, Privacy and AML/KYC policies.
<b>Transfer / casino credit claim narrowed</b>	The screenshots prove order and consent architecture, not by themselves a completed on-chain transfer or final casino credit.
<b>Succession thesis split into three levels</b>	Functional succession, operational continuity and common ownership are assessed separately.
<b>Regulatory sequence corrected</b>	The analysis focuses on Lithuania's earlier 31 Dec 2025 cut-off versus Poland's 1 Jul 2026 transition; Estonia is not treated as an equivalent migration driver.
<b>MiCA territorial language corrected</b>	Georgia is outside the EU establishment perimeter, but not necessarily outside MiCA's territorial service perimeter.
<b>Paysafe context upgraded</b>	Paysafe's 2026 MiCA CASP authorisation is included, without implying that its CASP service executes the Nylo transaction.
<b>Nylo self-description tested against live flow</b>	The report foregrounds the contradiction between payment-intermediary / technical-intermediary language and a live crypto exchange order embedded in a casino cashier.



### 3. The Regulatory Migration Story: Lithuania → Poland → Georgia

The strongest new dramaturgy is jurisdictional. Each generation appears at a point where the preceding EU configuration becomes less sustainable. That sequence does not prove common ownership, but it materially strengthens the regulatory-displacement hypothesis because the moves are temporally coherent and economically rational.

#### 3.1 Lithuania: an earlier MiCA cut-off

The Bank of Lithuania stated that the transitional period for obtaining a CASP licence ended on 31 December 2025 and that, after the period, accepting new clients, custody and other crypto-asset services without the required authorisation would constitute illegal financial activity. [P6]

utPay's own terms then stated that all crypto-related services and features had been suspended and would not be provided unless and until UAB Utrg obtained the necessary MiCA authorisations. [P8]

This is a concrete regulatory endpoint. It does not prove that every legacy casino integration migrated because of MiCA, but it creates a powerful timing anchor for the next observed configuration.

#### 3.2 Poland: a longer national transition and an operational bridge

Poland's position was materially different. The Polish Financial Supervision Authority explained that Article 143(3) allowed eligible entities operating under prior national law to continue until 1 July 2026 or until authorisation was granted or refused, whichever came first. The KNF statement also made clear that the deadline could not be extended nationally. [P7]

More importantly, the utPay → ChainValley transition is not based only on visual similarity. Primary UTORG materials identify Chain Valley Sp. z o.o. as a third-party provider for crypto purchases in the UTORG product environment. A ChainValley terms document is also hosted on UTORG infrastructure. [P9] [P10]

That operational bridge materially strengthens the first migration leg. It still does not prove common ownership, but it means the utPay/UTORG and ChainValley environments were demonstrably connected at the service level.

#### 3.3 Georgia: the conversion node moves outside the EU

Nylo LLC identifies itself as a Georgian company, registration number 412790154, registered 18 February 2025 at 88 Avtomshenebeli St, Kutaisi Free Zone, Land Plot 01/298. Its public Terms describe merchant-integrated interfaces, movement of funds from a Payment Provider to Nylo for settlement to a Merchant, and brief holding of funds for settlement. [P1]

Georgia is not a regulatory vacuum. The National Bank of Georgia defines exchange between virtual assets and fiat and transfers of virtual assets for another person as virtual-asset services. In October 2025, the NBG expressly warned that persons operating in Free Industrial Zones are not exempt from VASP registration requirements. [P4] [P5]

The result is a coherent displacement pattern: an EU conversion node in Lithuania reaches an earlier MiCA cut-off; a Polish VASP-era node remains available during a longer transition; then a Georgian free-zone entity appears in a materially similar casino-facing function. That is not ownership proof. It is a high-value regulatory-arbitrage hypothesis.

Jurisdiction	Observed node	Regulatory / operational context	Assessment
Lithuania	utPay / UAB Utrg	National transition ended 31 Dec 2025; utPay terms suspend crypto services pending authorisation	Established regulatory timing; strong migration context
Poland	ChainValley	Eligible legacy providers could continue under Article 143(3) to 1 Jul 2026; primary UTORG documents identify Chain Valley in crypto-purchase service role	Documented operational bridge; ownership still unproven
Georgia	Nylo LLC	Non-EU free-zone company appears in overlapping casino cohort; NBG says FIZ status does not remove VASP-registration requirement	Strong displacement context; NBG status open



#### 4. Generation One: utPay / UAB Utrg — Lithuania

FinTelegram’s prior casino-rail mapping documented utPay as a buy-crypto layer embedded behind familiar payment methods in offshore casino cashiers, including environments where source-code captures linked casino payment aggregation to the broader UTOrg stack. Those internal investigative findings remain part of the evidence record. [F3] [F4]

The regulatory fact is clearer than the ownership narrative: by the end of 2025 Lithuania’s transition was closing, and utPay’s terms subsequently stated that crypto-related services were suspended pending the authorisations required under MiCA. [P6] [P8]

For the succession analysis, utPay provides the first reference architecture: a user-facing casino funding intent is converted into a crypto purchase and delivery process, with the crypto layer inserted between the payment instrument and the casino value chain.

#### EVIDENTIARY POSITION — GENERATION ONE

The existence of the utPay/UTOrg casino buy-crypto rail is supported by FinTelegram’s historical evidence archive and public utPay/UTOrg materials. The specific proposition that MiCA pressure caused each merchant to migrate is an inference from timing and subsequent behaviour, not a proven internal decision record.



## 5. Generation Two: ChainValley — Poland

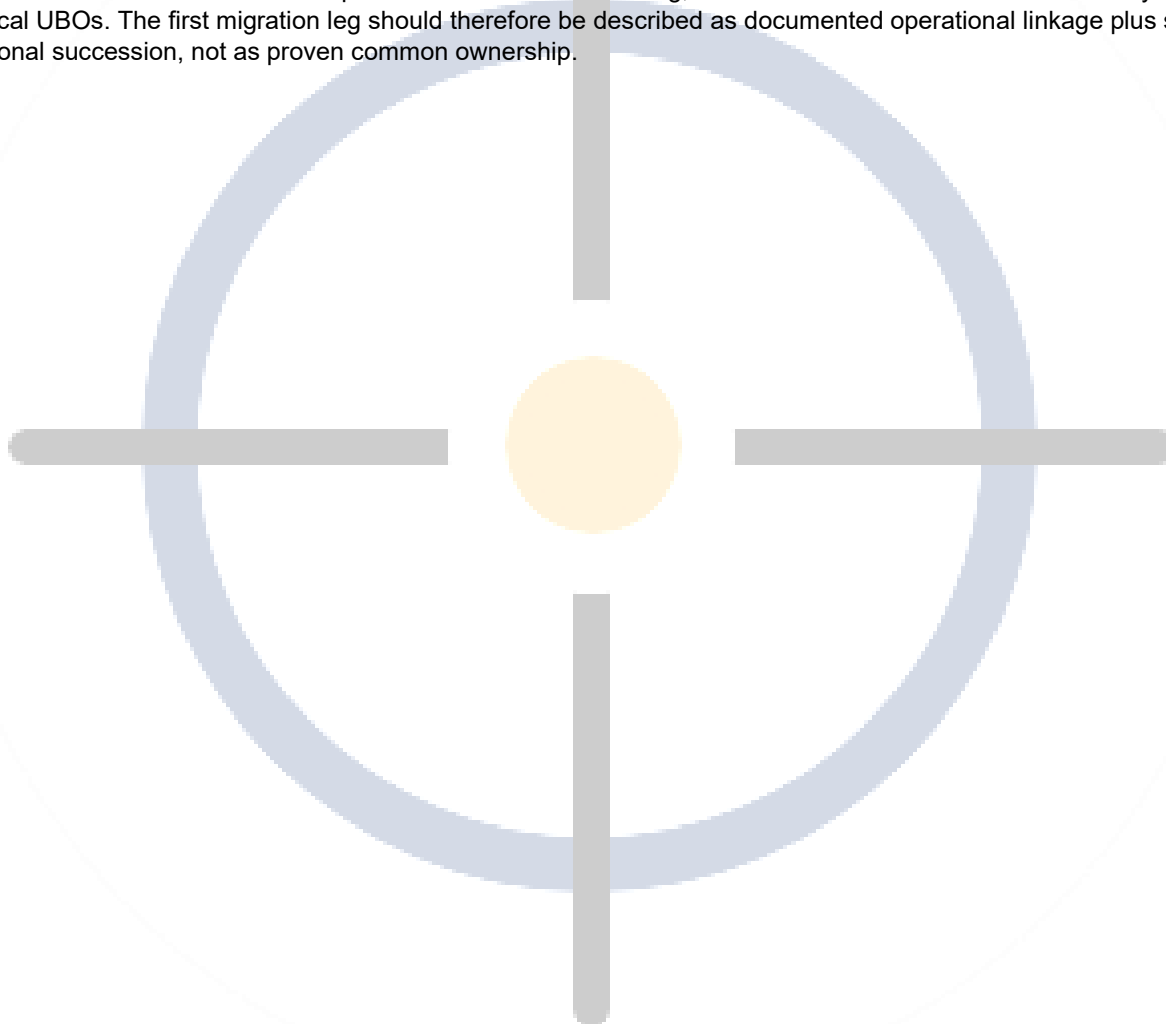
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Chain Valley Sp. z o.o. presents a much stronger continuity case than a mere “look-alike.” Its public terms define a platform for buying virtual currency with fiat and transferring the purchased asset to a pre-designated wallet. The terms expressly contemplate access through third-party portals and white-label integrations. [P10]

The primary operational bridge is decisive for the evidentiary hierarchy: UTOrg materials identify Chain Valley as the third-party provider for purchasing crypto assets through the UTOrg environment. This establishes an actual service relationship between the UTOrg product stack and ChainValley. [P9]

FinTelegram then documented ChainValley occupying materially the same cashier slot behind wallet-labelled methods in offshore casino environments. The relevant proposition is therefore not that a Polish company happened to design a similar website. It is that a known crypto-purchase provider in the UTOrg environment was observed in a materially similar casino conversion function after the Lithuanian node’s regulatory endpoint.

No public record reviewed for this report establishes that UAB Utrg, UTOrg LABS HOLDING or ChainValley shared identical UBOs. The first migration leg should therefore be described as documented operational linkage plus strong functional succession, not as proven common ownership.





## 6. Generation Three: Nylo — Georgia and the Betify Test

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### 6.1 Corporate profile

Nylo's own Terms identify Nylo LLC as a Georgian company with registration number 412790154 and the Kutaisi Free Zone address stated above. The Terms apply not only to nylo.pro but also to integrated payment interfaces on third-party websites. They define a Merchant, a Payment Provider, merchant-integrated APIs/widgets/white-label solutions and a transaction flow in which the Payment Provider transfers funds to Nylo for settlement to the Merchant. [P1]

Nylo's KYC/AML Policy, however, describes the company as acting "solely as a technical intermediary," says it does not conduct direct KYC/AML screening of Users, and states that it applies only limited transaction monitoring on a risk-based basis. [P2]

No directors, shareholders or UBOs are disclosed on the public Nylo pages reviewed for this report. No NBG VASP registration number is displayed there. This report does not conclude that Nylo is unregistered; authoritative status confirmation remains an open question.

### 6.2 July 2026 Betify flow: what was observed

FinTelegram re-tested Betify in July 2026. In both reviewed variants, a user selecting Neteller or Skrill in the casino cashier was routed to app.nylo.pro. The Nylo page was labelled "Exchange order," showed EUR 20 and the selected wallet brand, and included the consent statement: "I agree to buy crypto and send it to the specified address." [E1] [E2]

In the Neteller variant, the user also accepted the Terms of Use and Privacy Policy of the "Executing Service Provider." FinTelegram followed the legal links presented in the checkout. The Terms of Use, Privacy Policy and AML/KYC Policy links led to Nylo's own legal documentation. [E3]

That finding materially changes the analysis. The checkout does not visibly hand the user to clearly identified third-party crypto-provider terms. Nylo is the legal-policy endpoint of the transaction journey. The strongest fair formulation is therefore that Nylo appears to be the user-facing service provider associated with the execution layer of the exchange order. Whether Nylo itself performs the backend fiat-to-crypto conversion, acts as agent or router, or relies on another VASP/CASP/liquidity provider remains unknown.



### A — Betify → Nylo Neteller flow

The screenshot shows the Betify website interface. On the left is a navigation sidebar with various game and promotion options. The main area displays the 'Wallet' section with different payment methods. A modal window is overlaid, showing a transaction for 20 EUR using Neteller. The modal includes a 'Pay 20 EUR' button and two checked consent boxes: 'I read and agree to the Terms of Use and Privacy Policy of the Executing Service Provider' and 'I agree to buy crypto and send it to the specified address'.

### B — Betify → Nylo Skrill flow

This screenshot shows the Betify website with the 'Deposit' section active. A modal window is open for a 20 EUR Skrill deposit. The modal displays the amount '20 EUR' and the Skrill logo. It includes a 'Pay 20 EUR' button and a consent checkbox: 'I agree to buy crypto and send it to the specified address'. The background shows the 'Deposit' interface with various amount options (30, 50, 200, 500) and a 'Deposit' button.

Figure 1 — July 2026 Betify evidence plate. The screenshots document routing to app.nylo.pro, EUR 20 “Exchange order” pages, Neteller/Skrill branding and the buy-crypto / specified-address consent. They do not by themselves prove a completed on-chain transfer or identify the destination beneficiary.



### 6.3 What the screenshots prove — and what they do not

Finding	Status	Comment
Nylo-hosted order page	Confirmed by screenshots	app.nylo.pro visible in the transaction journey
“Exchange order” label	Confirmed by screenshots	Displayed at the top of the Nylo transaction page
EUR 20 amount	Confirmed by screenshots	Visible in both captured variants
Neteller / Skrill branding	Confirmed by screenshots	Corresponding wallet brand visible in the Nylo order
Buy-crypto consent	Confirmed by screenshots	User agrees to buy crypto and send it to the specified address
Nylo legal-policy endpoint	Confirmed by FinTelegram link test	Terms, Privacy and AML/KYC links led to Nylo policies
Nylo as backend converter	Not established	The screenshots do not identify technical execution, principal/agent status or liquidity source
Completed crypto transfer	Not established by screenshots alone	Requires transaction completion evidence and/or blockchain trace
Destination wallet owner	Unknown	No beneficiary ownership established from the reviewed screens
Common ownership with earlier rails	Unproven	Requires corporate, technical, contractual or wallet evidence





## 7. The Nylo Compliance Contradiction Matrix

The strongest immediate story is the tension between Nylo’s public legal narrative and the live transaction architecture observed at Betify. These are not minor drafting differences. They go to role classification, merchant due diligence, AML allocation and the crypto-service perimeter.

Nylo position / language	What FinTelegram found	Compliance assessment
<b>Payment intermediary</b>	Live Betify flow opens a Nylo “Exchange order” requiring consent to buy crypto and send it to a specified address.	The visible footprint is more substantial than a simple payment gateway and requires a clear regulatory explanation.
<b>Policies of the “Executing Service Provider”</b>	The legal links tested in the checkout led to Nylo’s own Terms, Privacy and AML/KYC documents.	Nylo is the user-facing legal-policy endpoint attached to the execution layer; the obvious question is whether Nylo itself is the executing provider.
<b>Merchant payment settlement model</b>	The live product is explicitly labelled “Exchange order.”	The public contractual narrative and the live crypto-purchase journey materially diverge.
<b>“Solely a technical intermediary”</b>	Nylo hosts the order page and its policies govern the user-facing journey.	The technical-intermediary narrative is difficult to reconcile with Nylo’s central interface and legal position without a fuller role explanation.
<b>No direct User KYC</b>	The apparent transaction involves buying crypto and sending it onward.	Who performs crypto-specific CDD, sanctions screening, blockchain analytics, destination-wallet risk controls and Travel Rule obligations?
<b>Limited transaction monitoring</b>	The route originates in an offshore casino cashier and enters a crypto-purchase workflow.	A high-risk gambling-to-crypto pattern combined with limited monitoring raises serious accountability questions.
<b>Generally does not support gambling payments</b>	FinTelegram reached Nylo directly from Betify’s casino cashier through Neteller/Skrill-labelled methods.	Either the gambling relationship was knowingly approved under an exception or merchant-control mechanisms require explanation.
<b>Georgian Free Zone entity</b>	NBG says VASP requirements apply within Georgia, including Free Industrial Zones.	Free-zone status is not a regulatory escape hatch; VASP status is a central open question.
<b>Non-EU establishment</b>	The flow is integrated into an EU-facing, euro-denominated casino journey.	Being incorporated in Georgia does not necessarily remove MiCA territorial relevance.
<b>Potential reverse-solicitation defence</b>	The user enters a casino cashier and is routed into Nylo rather than independently seeking Nylo crypto services.	On the observed facts, a simplistic “own exclusive initiative” theory appears strained.
<b>Restricted-country framework</b>	The reviewed Terms do not amount to an EU-wide prohibition.	Absence of a bloc-wide exclusion is relevant when combined with merchant-integrated EU access.
<b>No proven ownership link to ChainValley / utPay</b>	The transaction logic, consent wording, cohort overlap and timing are materially continuous.	Common ownership is unproven, but the operational-succession hypothesis is substantial and testable.

### CORE CONTRADICTION

Nylo’s live product architecture appears to perform or at minimum orchestrate a crypto exchange-and-transfer journey that is far more substantial than the company’s public “technical intermediary” narrative suggests. If another entity performs the backend execution, that entity’s identity, role and regulatory status require disclosure.



## 8. Succession Analysis: Why This Is More Than a Look-Alike

The evidentiary force lies in accumulation. Any one similarity — a .pro domain, an exchange-order label or a Neteller logo — could be coincidental. The combined pattern is different: materially similar function, recurring wallet wrappers, recurring consent language, overlapping casino environments, merchant-integrated architecture, sequential timing and a jurisdictional sequence that maps onto regulatory transition dates.

Evidence layer	Observation	Weight
<b>Functional role</b>	Casino funding intent is converted into a crypto purchase / onward delivery process	Very strong
<b>Cashier-slot continuity</b>	Observed replacement of one crypto-conversion node by another in the same type of merchant environment	Very strong where per-casino chronology is preserved
<b>Wallet-wrapper continuity</b>	Neteller, Skrill and related familiar payment-method labels recur	Strong
<b>Consent-language continuity</b>	“Buy crypto and send it to the specified address” reappears	Very strong
<b>Transaction logic</b>	Fiat/wallet funding → exchange order → crypto delivery to designated address	Very strong
<b>Merchant cohort overlap</b>	Betify and other offshore-casino environments recur across reviews	Strong
<b>UTORG–ChainValley bridge</b>	Primary UTORG documents identify Chain Valley as crypto-purchase service provider	Very strong for first migration leg
<b>Domain / interface pattern</b>	Merchant-integrated app.[brand].pro architecture	Moderate alone; strong in combination
<b>Temporal sequence</b>	utPay suspension → ChainValley phase → Nylo emergence	Strong contextual evidence
<b>Jurisdiction sequence</b>	Lithuania → Poland → Georgia	Strong regulatory-displacement context
<b>Shared source code / backend</b>	Not yet forensically established	Open
<b>Shared wallets / settlement accounts</b>	Not established	Open
<b>Common UBO / control</b>	Not established	Open

### 8.1 The three propositions must remain separate

First — functional succession. This is the strongest proposition. Nylo appears to occupy materially the same functional position previously observed with ChainValley and, before that, utPay. The evidence is sufficient to state this forcefully, subject to the normal limits of external testing.

Second — operational or infrastructure continuity. This is a strong hypothesis, not yet a fact. The pattern warrants technical fingerprinting, merchant-contract analysis, wallet clustering and personnel/ownership research.

Third — common ownership or control. This remains unproven. The absence of UBO proof should not be allowed to erase the functional evidence, but it must remain a visible limitation in every headline-level claim.

### 8.2 Competing explanations

Explanation	Description	Current assessment
<b>Direct successor / shared control</b>	Nylo is a new jurisdictional shell or operating entity for substantially the same network	Fits the timing and continuity; unproven without corporate or technical bridge
<b>Shared technology / white-label supplier</b>	Different legal entities use a common platform, integrator or backend provider	Could explain near-identical transaction logic without common ownership
<b>Casino-side aggregator migration</b>	A cashier aggregator replaced one provider with another while preserving the merchant UX	Could explain seamless merchant-side transition; still supports functional succession
<b>Independent imitation</b>	Nylo independently copied a commercially common model	Possible but becomes less persuasive as specific wording, cohort overlap and timing accumulate



## The Nylo rail and the regulatory migration pattern

Betify tested case, July 2026 — evidentiary model: facts, strong indicators, hypothesis and open questions

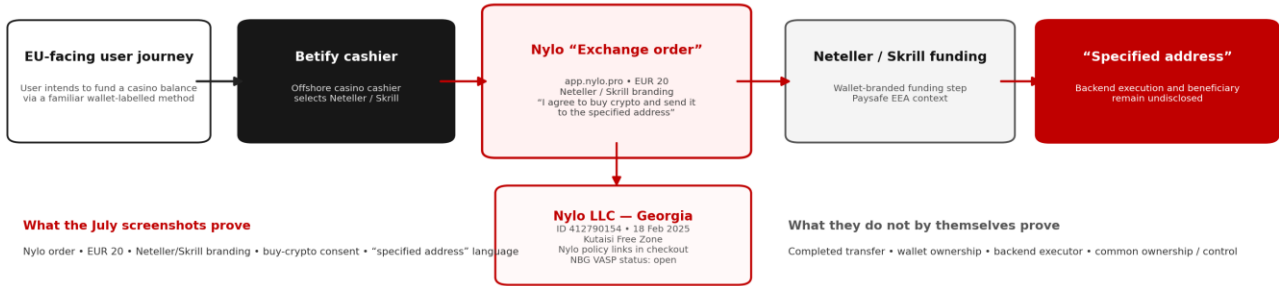
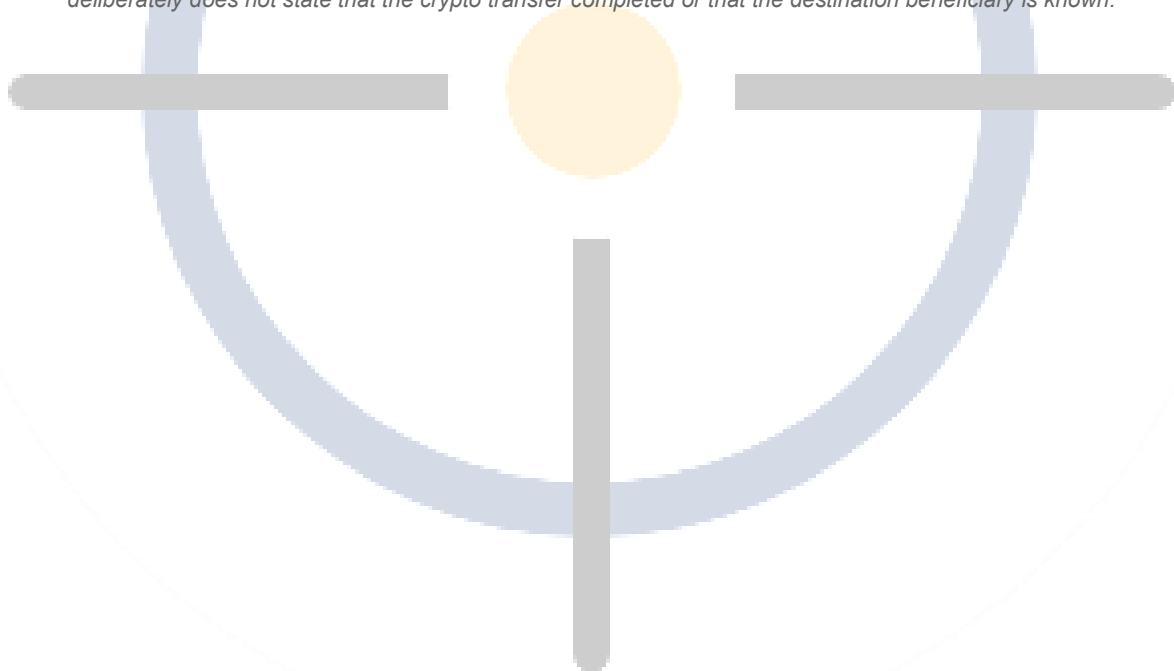


Figure 2 — FinTelegram analytical model. Functional succession is assessed separately from ownership proof. The flow deliberately does not state that the crypto transfer completed or that the destination beneficiary is known.





## 9. MiCA: The Offshore Back Door Question

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### 9.1 Post-1 July 2026 expectations

ESMA's 23 June 2026 public statement addressed the end of the MiCA transition on 1 July. It expects unauthorised CASPs to take immediate steps to wind down EU activities and, in particular, stop onboarding new EU clients, opening new client relationships and marketing or solicitation. [P11]

The legal question for Nylo is functional. If the transaction constitutes exchange of crypto-assets for funds, execution of orders, transfer services or another MiCA crypto-asset service provided to EU clients, a Georgian incorporation does not by itself resolve the EU authorisation issue. The precise answer depends on who provides which service and to whom. [P14]

### 9.2 Reverse solicitation appears difficult on the observed facts

ESMA's reverse-solicitation guidelines require the client's "own exclusive initiative" to be construed narrowly and treat the assessment as factual. Contractual disclaimers cannot override contrary facts. The guidelines also warn that an EU payment service provider should not redirect clients to a third-country crypto provider in a way that constitutes solicitation. [P12]

The Betify fact pattern is therefore problematic for a simple reverse-solicitation narrative: the user enters a casino cashier, selects a familiar wallet-labelled funding method and is then routed into a Nylo exchange order. The user does not appear to have independently searched for Nylo in order to request crypto services.

This does not establish a MiCA breach. Nylo could argue that its client is a merchant or intermediary, that another provider executes the crypto service, or that the observed flow has a different legal character. Those arguments make role disclosure more important, not less.

### 9.3 Correct territorial formulation

#### LEGAL PRECISION

Nylo is outside the EU establishment and home-state supervisory perimeter. It is not therefore automatically outside MiCA's territorial service perimeter. The report deliberately avoids the inaccurate formulation that Georgia places Nylo "outside MiCA's reach."



## 10. Georgia: VASP Perimeter and Free-Zone Status

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The NBG’s public VASP framework defines a VASP as a person providing virtual-asset services for the benefit of another person. The listed activities include exchange between convertible virtual assets and fiat currencies and transfer of convertible virtual assets. [P4]

The NBG’s October 2025 warning is unusually relevant to Nylo’s disclosed address. It states that persons intending to provide virtual-asset services within Georgia — including Free Industrial Zones — must ensure proper registration with the NBG unless another relevant financial-sector authorisation applies. [P5]

The open question is therefore concrete: does Nylo LLC hold an NBG VASP registration or another authorisation covering the observed activity? This report has not established the answer and does not state that Nylo is unregistered.

The apparent mismatch between Nylo’s public “payment intermediary” / “technical intermediary” language and a live exchange-order journey makes the classification question more urgent. The decisive facts would include who is the crypto seller or counterparty, who sets the exchange rate, who receives the fiat, who acquires the crypto, who controls the destination address and who broadcasts the transfer.





## 11. Paysafe, Neteller and Skrill: The EU Chokepoint

The appearance of Neteller and Skrill in the observed flow does not by itself prove that Paysafe knowingly approved Betify, Nylo or any ultimate crypto beneficiary. The screenshots document a user-facing route, not the underlying merchant contracts, descriptors or monitoring data.

The regulatory context is nevertheless significant. Paysafe states that Paysafe Payment Solutions Limited trades as Paysafe, Neteller, Skrill and related services in the EEA and is regulated by the Central Bank of Ireland. In April 2026 Paysafe also announced that it had obtained a MiCA CASP licence from the Central Bank of Ireland, enabling regulated crypto services across the EEA. [P13] [P15]

That does not mean Paysafe's MiCA-authorized crypto service executes the Nylo order. The report therefore separates three possibilities: Paysafe may be only the e-money funding instrument; Nylo may be an independently onboarded merchant or partner; or a Paysafe crypto service may have some role or visibility. The contractual and transaction data are required to distinguish them.

Question area	Compliance question
<b>Merchant identity</b>	Under what legal merchant name do app.nylo.pro-originated payments settle?
<b>Risk classification</b>	Is the merchant classified as crypto, gambling, payment processing or another category?
<b>Underlying purpose</b>	Does monitoring identify that the flow originates in a Betify casino cashier?
<b>MiCA role</b>	Is any Paysafe CASP-authorized service involved, or is Paysafe solely the wallet funding rail?
<b>Prior pattern</b>	Were structurally similar utPay and ChainValley flows previously identified and remediated?
<b>Jurisdiction controls</b>	How are gambling licence blocks and EU country restrictions applied when a crypto-conversion layer is interposed?



## 12. AML/CFT and Gambling Compliance

### 12.1 Layered intermediation risk

The sequence wallet-branded payment → exchange order → specified address → casino-value context structurally resembles layered intermediation patterns associated with elevated transaction-laundering risk. The report does not state that transaction laundering occurred. The risk question is whether the architecture can obscure payer, purpose or ultimate beneficiary from upstream institutions depending on merchant configuration, descriptors and data sharing.

The strongest AML tension is Nylo's own allocation model. Its KYC/AML Policy says it does not conduct direct KYC/AML screening of Users and applies limited transaction monitoring, while the observed user journey presents a crypto purchase and transfer instruction. [P2]

The compliance questions are therefore practical: who performs crypto-specific CDD, source-of-funds assessment where required, sanctions screening, blockchain analytics, destination-wallet risk screening and Travel Rule obligations? A regulated wallet's KYC of the fiat funding instrument is not automatically the same thing as compliance for a subsequent crypto service.

### 12.2 Gambling contradiction

Nylo's Terms list illicit gambling as prohibited and state that even legal regulated gambling transactions may be permitted only if explicitly allowed by Nylo, while adding that Nylo generally does not support gambling payments. [P1]

FinTelegram nevertheless reached Nylo from the Betify casino cashier. That creates a direct merchant-compliance question: was a gambling-related merchant knowingly approved under an exception, was the underlying casino context visible, or did the merchant-control framework fail to identify the source and purpose of the flow?

The report avoids a blanket assertion that Betify is illegal in every EU jurisdiction. Gambling legality is market-specific. The relevant point is that offshore operators may lack local authorisation in particular markets and that payment facilitators must understand the true merchant purpose, licence footprint and country restrictions.

### 12.3 Chokepoint control map

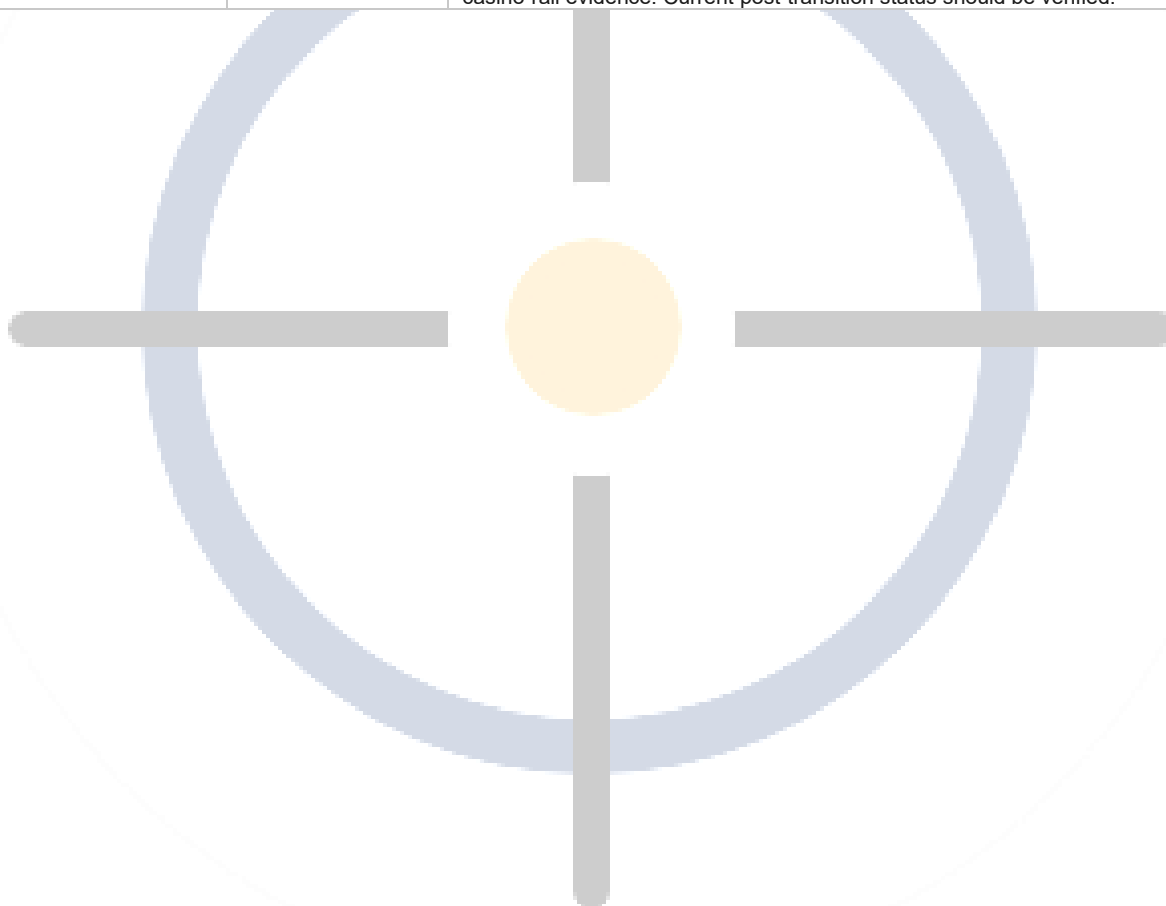
Chokepoint	Control expectation	Detection question
<b>Casino / cashier aggregator</b>	Target-market operator licensing; payment-method gating; player-protection controls	Who configured the wallet-labelled route to a crypto exchange order, and under which merchant contract?
<b>Nylo</b>	Role classification; VASP/CASP perimeter; merchant KYB; AML allocation; destination-wallet controls	Who is the client, who executes the exchange, and who controls the specified address?
<b>Neteller / Skrill / Paysafe</b>	Merchant onboarding; risk classification; crypto/gambling monitoring; jurisdiction blocks	What merchant identity and purpose are visible in Paysafe systems?
<b>Banks / issuers</b>	Pattern monitoring; source-of-funds and suspicious activity escalation	Are rapid wallet funding and crypto-gateway spending patterns visible and risk-scored?
<b>Regulators</b>	Registration enforcement; thematic review; coordinated payment blocking	Does the utPay → ChainValley → Nylo pattern justify structure-level intervention rather than node-by-node action?



### 13. Risk Assessment

Ratings express regulatory, counterparty and transparency exposure on the evidence currently available. They do not express culpability and are revisable upon documentary clarification.

Entity / layer	Exposure	Basis
<b>Nylo LLC</b>	High	Established: Georgian 2025 entity; Kutaisi Free Zone address; merchant-integrated payment role in Terms. Strong indicators: live Betify exchange order, crypto-purchase consent, Nylo legal-policy endpoint. Open: NBG VASP status, UBOs, backend executor, destination beneficiary. Ordinarily warrants enhanced due diligence and potentially refusal absent satisfactory clarification.
<b>Betify and observed cohort</b>	High	Offshore casino environments with fragmented payment rails and recurring crypto-conversion interposition. Per-market licence status requires current regulator-by-regulator verification.
<b>Paysafe / Neteller / Skrill</b>	Medium-to-High, fact-dependent	Regulated EEA wallet brands front the tested methods; Paysafe also holds a MiCA CASP authorisation. Exposure depends on merchant classification, approval, monitoring and knowledge of the gambling nexus. No failure is asserted.
<b>Upstream banks / issuers</b>	Medium	Derivative exposure. Visibility depends on data available around wallet funding, merchant descriptors and downstream spend patterns.
<b>Legacy utPay / ChainValley rails</b>	Realised / elevated	utPay publicly suspended crypto services pending authorisation; ChainValley is documented in UTOrg's crypto-purchase environment and in FinTelegram's casino-rail evidence. Current post-transition status should be verified.





## 14. Open Questions and Right-of-Reply Framework

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FinTelegram invites all named entities to provide corrections, statements and supporting documents. Substantiated corrections will be incorporated into updated versions. Silence will be recorded as such without adverse inference stated as fact.

### 14.1 Questions to Nylo LLC

1. Who are Nylo LLC's directors, shareholders and ultimate beneficial owners?
2. Is Nylo LLC registered with the National Bank of Georgia as a VASP or otherwise authorised for the observed activity? If yes, under what registration or authorisation?
3. In the tested Neteller flow, the user accepts policies of the "Executing Service Provider," and the tested legal links lead to Nylo documents. Does Nylo consider itself the Executing Service Provider?
4. If yes, what precise service does Nylo execute: fiat-to-crypto exchange, order execution, transfer, payment settlement, agency, brokerage, routing or another function?
5. If another entity performs backend conversion or transfer, who is that entity, what is its regulatory status and why is it not clearly identified at the transaction point?
6. Which entity is the legal seller or counterparty for the crypto asset purchased through the tested exchange order?
7. Which crypto asset is purchased and who sets the exchange rate?
8. Who controls or designates the "specified address," and who is the economic beneficiary?
9. Who performs KYC/CDD, sanctions screening, blockchain analytics, destination-wallet screening and Travel Rule compliance?
10. Does Nylo knowingly provide services to Betify or a Betify-related merchant or agent? Which contractual entity is onboarded?
11. How does the Betify integration comply with Nylo's statement that it generally does not support gambling payments?
12. Does Nylo share ownership, management, technology, source code, processing partners, wallet infrastructure, merchant contracts, employees or beneficial owners with UAB Utrg, utPay, UTOrg, Utorg OÜ or ChainValley?
13. On what legal basis are Nylo-integrated crypto-purchase flows made available to EU residents after 1 July 2026?
14. Does Nylo rely on reverse solicitation? If so, how does it reconcile that position with routing from a casino cashier into a Nylo exchange order?

### 14.2 Questions to Betify operators and related payment agents

1. Which legal entity contracted with Nylo for the tested Neteller/Skrill routes?
2. Under which gambling licence and target-market legal basis are deposits accepted from each EU jurisdiction?
3. Why is a casino funding journey converted into a crypto exchange order, and how is this disclosed to users?
4. Who controls the specified destination address and how does value reach the player ledger?
5. What due diligence was performed on Nylo's corporate ownership, licensing and AML framework?
6. How do deposit limits, self-exclusion and source-of-funds controls operate when the underlying payment is presented as a crypto purchase?

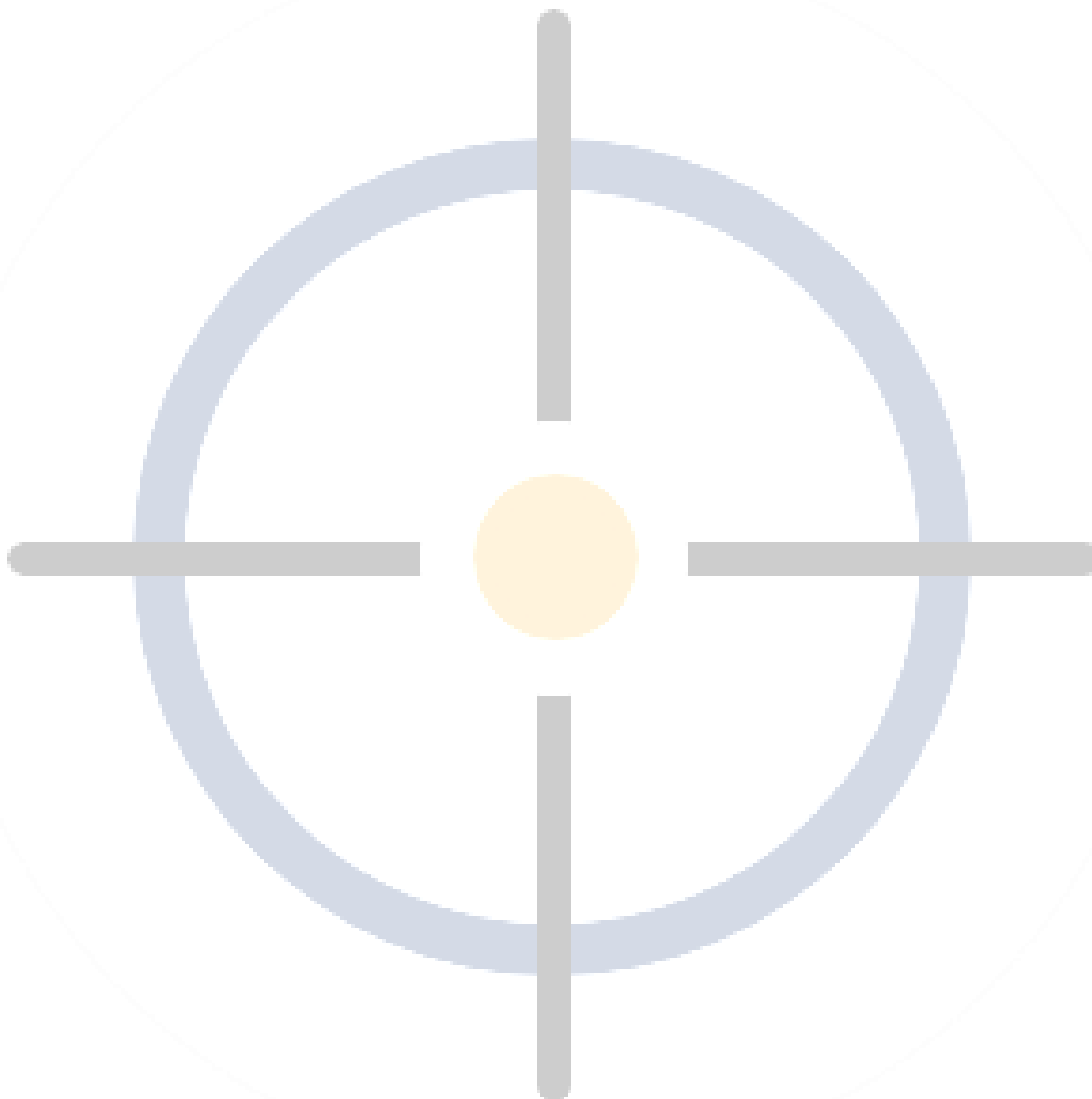
### 14.3 Questions to Paysafe / Neteller / Skrill

1. Is Nylo LLC, or any intermediary through which the observed flows run, an onboarded merchant, partner or customer?
2. Under what merchant identity, category, descriptor and risk classification do the transactions settle?
3. Do Paysafe systems identify that the flow originates in an offshore casino cashier?
4. Is Paysafe involved only as the e-money funding rail, or does any Paysafe MiCA-authorized crypto service participate in or support the order?
5. Were structurally similar utPay and ChainValley flows identified previously, and what remediation followed?
6. How do gambling licence gating and jurisdiction blocks operate when a crypto-conversion layer is interposed between the wallet and the casino?



#### 14.4 Questions for regulators

1. Does Nylo LLC hold or require NBG VASP registration for the observed activity?
2. Does the merchant-routed EU user journey fall within MiCA's authorisation perimeter, and can reverse solicitation plausibly apply?
3. Does the utPay → ChainValley → Nylo sequence justify coordinated action across crypto, payments, AML and gambling supervisors?
4. Should wallet and e-money providers receive specific supervisory guidance on crypto-gateway interposition in gambling flows?





## 15. What Would Prove or Refute Infrastructure Continuity

Further screenshots have diminishing marginal value. The next phase should target technical, contractual and economic bridge evidence capable of proving or refuting continuity.

Target	Evidence to collect	Why it matters
<b>Shared frontend</b>	JavaScript bundle hashes; source maps; CSS classes; component names; identical error text	Strong fingerprint of common codebase or vendor
<b>Shared API design</b>	HAR captures; route names; request/response schemas; token parameter structure; order-state transitions	Can distinguish common backend from superficial visual similarity
<b>Telemetry</b>	Google Tag Manager IDs; analytics IDs; Sentry DSNs; monitoring endpoints	Often exposes shared operators or development environment
<b>Infrastructure</b>	DNS history; TLS certificates; CDN/origin patterns; ASN; shared API hosts	Can reveal common hosting or migration
<b>Wallet flows</b>	Destination-address clustering; funding wallets; settlement wallets; common counterparties	Potential economic bridge / strongest blockchain evidence
<b>Merchant records</b>	Paysafe merchant IDs; descriptors; acquirer data; contracting entity	Can identify whether provider switch was contractual or cosmetic
<b>Casino configuration</b>	Aggregator settings; processor keys; before/after configuration; integration tickets	Direct evidence of migration from ChainValley to Nylo
<b>Personnel / ownership</b>	Georgian registry records; UBO filings; developers; employment history; beneficial owners	Required for common-control proposition
<b>Session-level migration</b>	Same casino account / cashier before and after provider switch without UX redesign	Strong evidence of interchangeable node replacement

### PRIORITY INVESTIGATIVE TEST

Capture full HAR files and page resources from app.nylo.pro and any archived or still-accessible app.chainvalley.pro flow. Compare URL paths, order IDs, token parameters, API schemas, browser storage keys, consent strings, error messages, JS bundles and telemetry identifiers. A shared technical fingerprint would materially upgrade the continuity thesis.



## 16. Conclusion: A Regulatory Migration Story

This is no longer merely a Nylo story. It is a regulatory migration story: Lithuania → Poland → Georgia; utPay → ChainValley → Nylo; changing legal entities and jurisdictions while a materially similar casino-facing crypto-conversion function appears to survive.

The first migration leg is supported by more than similarity. Public UTORG materials identify Chain Valley in a crypto-purchase service role, creating a documented operational bridge between the UTORG environment and the Polish provider. The second leg — ChainValley to Nylo — remains unproven at ownership level but displays striking functional, textual, merchant-side and temporal continuity.

The July Betify evidence sharpens the case. A user selecting Neteller or Skrill is routed to a Nylo “Exchange order” and agrees to buy crypto and send it to a specified address. The associated legal-policy links resolve to Nylo’s own documentation. Nylo is therefore not merely a hidden technical pipe in the user journey; it is the visible legal-policy endpoint of the transaction architecture.

That architecture collides with Nylo’s own public narrative. Its Terms describe payment intermediation and merchant settlement. Its AML policy describes a technical intermediary that does no direct user KYC and only limited monitoring. Its Terms say gambling payments are generally unsupported. Yet FinTelegram reached a Nylo exchange order directly from the Betify casino cashier.

The post-MiCA stakes are larger than one gateway. ESMA’s 1 July deadline forces EU providers to authorise or exit, but demand can migrate offshore. The enforcement challenge is therefore structural: regulators must follow the distribution channel into merchant integrations, wallet-branded payment methods, third-country gateways and the regulated EU chokepoints that continue to fund them.

FinTelegram’s final position is deliberately precise: functional succession is strongly supported; operational or infrastructure continuity is a strong hypothesis; common ownership and control remain unproven. The evidence is already sufficient to justify coordinated regulatory scrutiny. The remaining question is whether compulsory records, technical fingerprinting and wallet analysis will turn the migration hypothesis into a documented continuity finding.

### FINAL ASSESSMENT

The corporate shell may move. The jurisdiction may move. The regulated node may move. The question for post-MiCA enforcement is whether the underlying casino-facing conversion function is allowed to survive by migrating one jurisdiction further away each time scrutiny arrives.



## 17. Principal Sources and Evidence Index

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### 17.1 Primary and regulatory sources

- [P1] Nylo — Terms of Use — <https://nylo.pro/terms-of-use>
- [P2] Nylo — KYC/AML Policy — <https://nylo.pro/kyc-aml-policy>
- [P3] Nylo — Privacy Policy — <https://nylo.pro/privacy-policy>
- [P4] National Bank of Georgia — Virtual Asset Service Providers (VASPs) — <https://nbg.gov.ge/en/page/virtual-asset-service-providers-vasps>
- [P5] National Bank of Georgia — Warning on unregistered virtual-asset services, including Free Industrial Zones — <https://nbg.gov.ge/en/media/news/national-bank-of-georgia-urges-citizens-not-to-engage-in-virtual-asset-services-with-unreg>
- [P6] Bank of Lithuania — MiCA transition ending 31 December 2025 and orderly wind-down expectations — <https://www.lb.lt/en/news/lietuvos-bankas-crypto-asset-service-providers-that-do-not-intend-to-continue-their-operations-must-ensure-smooth-winding-down>
- [P7] Polish Financial Supervision Authority — Statement on MiCA transition before and after 1 July 2026 — [https://www.knf.gov.pl/knf/en/komponenty/img/Statement\\_of\\_the\\_Polish\\_Financial\\_Supervision\\_Authority\\_97112.pdf](https://www.knf.gov.pl/knf/en/komponenty/img/Statement_of_the_Polish_Financial_Supervision_Authority_97112.pdf)
- [P8] utPay — Terms of Use / suspension of crypto-related services pending MiCA authorisation — <https://utpay.io/tou>
- [P9] UTORG — Terms / primary materials identifying Chain Valley as crypto-purchase service provider — <https://static.utorg.com/legal/TermsOfUseUtorgCom.pdf>
- [P10] ChainValley — Terms of Use and Privacy Policy hosted on UTORG infrastructure — <https://static.utorg.com/legal/ChainvalleyTermsofUse%20andPrivacyPolicy.pdf>
- [P11] ESMA — 23 June 2026 Public Statement on end of MiCA transitional period — [https://www.esma.europa.eu/sites/default/files/2026-06/ESMA75-113276571-1710\\_Public\\_Statement\\_MiCA\\_transitional\\_period\\_ends.pdf](https://www.esma.europa.eu/sites/default/files/2026-06/ESMA75-113276571-1710_Public_Statement_MiCA_transitional_period_ends.pdf)
- [P12] ESMA — Guidelines on reverse solicitation under MiCA — [https://www.esma.europa.eu/sites/default/files/2025-02/ESMA35-1872330276-2030\\_Guidelines\\_on\\_reverse\\_solicitation\\_under\\_MiCA.pdf](https://www.esma.europa.eu/sites/default/files/2025-02/ESMA35-1872330276-2030_Guidelines_on_reverse_solicitation_under_MiCA.pdf)
- [P13] Paysafe — Skrill and Neteller expand regulated crypto services after MiCA CASP licence — <https://www.paysafe.com/en/resource-center/skrill-neteller-expand-regulated-crypto-services-germany/>
- [P14] Regulation (EU) 2023/1114 — Markets in Crypto-Assets Regulation — <https://eur-lex.europa.eu/eli/reg/2023/1114/oj>
- [P15] Paysafe 2025 Annual Report / 20-F — regulatory and crypto-service disclosures — <https://ir.paysafe.com/financial-info-and-filings/sec-filings/content/0001193125-26-088095/psfe-20251231.htm>

### 17.2 FinTelegram investigative sources

- [F1] The Nylo Switch: Did Offshore Casinos Just Replace ChainValley With a Georgian Crypto Rail? — 25 May 2026 — <https://fintelegam.com/the-nylo-switch-did-offshore-casinos-just-replace-chainvalley-with-a-georgian-crypto-rail/>
- [F2] Betify Payment Rails Review — 8 May 2026 — FinTelegram internal/publication archive
- [F3] From Lithuania to Poland: The UTORG Group's Regulatory Migration and the Rise of ChainValley — 13 Feb 2026 — FinTelegram internal/publication archive
- [F4] Related FinTelegram casino fake-FIAT and ChainValley payment-rail investigations — 2024–2026 — FinTelegram evidence archive

### 17.3 FinTelegram test evidence

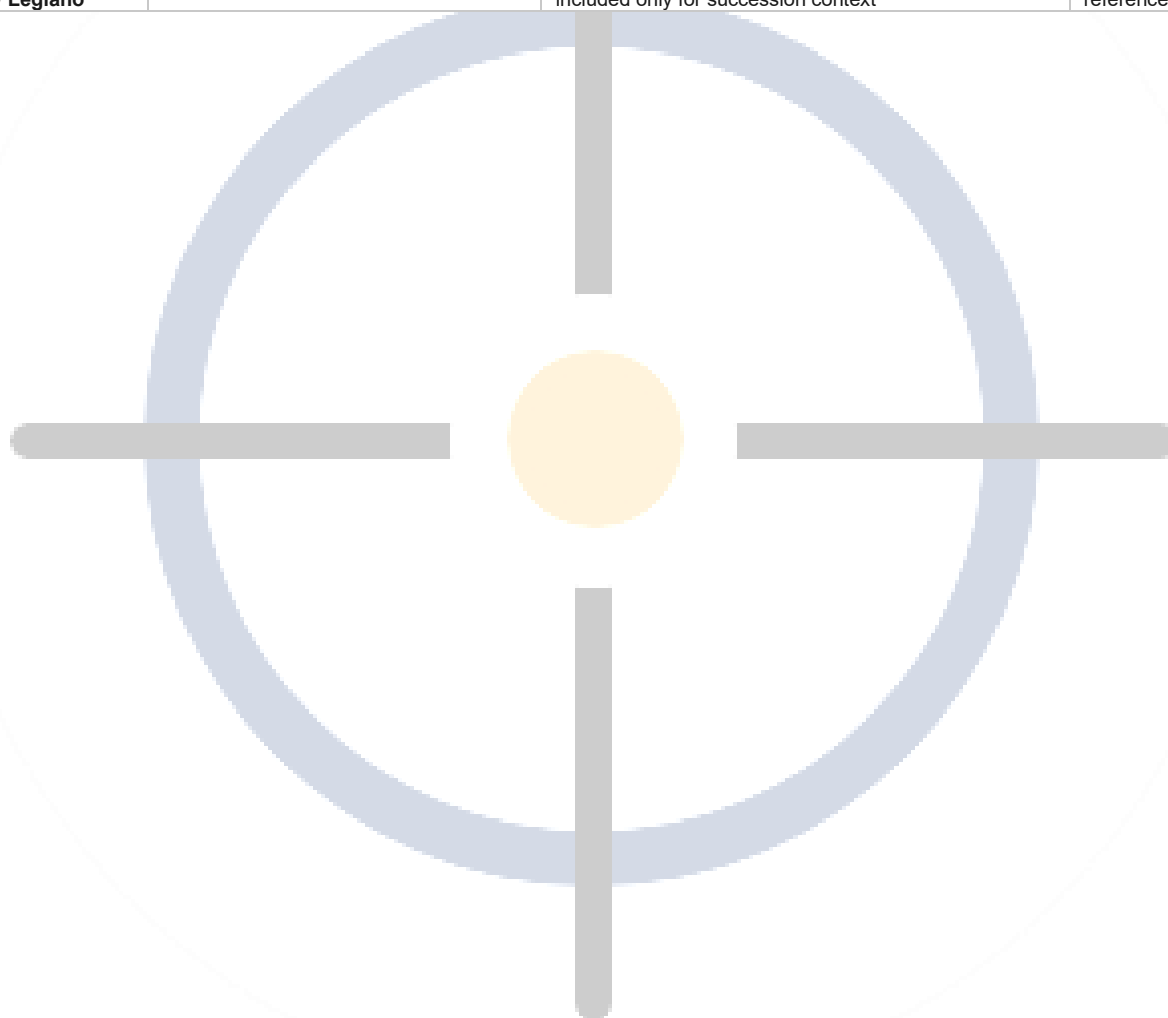
- [E1] Betify July Neteller → Nylo screenshot: app.nylo.pro, EUR 20, Neteller branding, exchange-order consent
- [E2] Betify July Skrill → Nylo screenshot: app.nylo.pro, EUR 20, Skrill branding, exchange-order consent
- [E3] FinTelegram July 2026 link test: checkout Terms, Privacy and AML/KYC links resolve to Nylo legal documentation
- [E4] May 2026 Nylo cohort screenshots across reviewed offshore-casino cashiers
- [E5] Legacy utPay / ChainValley screenshots and source captures in FinTelegram evidence archive



## Annex A — Observed Casino Cohort and Rail Context

The matrix records FinTelegram observations at the stated review periods. Payment configurations can change rapidly. Inclusion is not a finding that any casino currently uses the same rail or that any named operator has committed unlawful conduct.

Casino	Operator wrapper as reviewed	Observed rail context	Evidentiary role
<b>Betify</b>	Fortuna Games N.V. / Deltaprime Limited as reviewed; prior wrappers included Altacore / Altaprime	Neteller/Skrill → Nylo exchange-order flow observed May and July 2026; other fragmented rails documented separately	Tested case of this report
<b>Betalice</b>	Operator disclosure varied / limited in reviewed domains	utPay-era presence; ChainValley wallet-labelled flows; Nylo observed in later cohort review	Migration-overlap indicator
<b>SpinBoss</b>	See FinTelegram cohort reporting	Nylo observed behind wallet-labelled deposit methods	Cohort indicator
<b>DudeSpin</b>	See FinTelegram cohort reporting	Nylo observed behind wallet-labelled deposit methods	Cohort indicator
<b>Malina Casino</b>	See FinTelegram cohort reporting	Nylo observed behind wallet-labelled deposit methods	Cohort indicator
<b>Oro.gg</b>	See FinTelegram cohort reporting	Nylo observed behind wallet-labelled deposit methods	Cohort indicator
<b>LuckyDreams / Rooli / Legiano</b>	Various offshore wrappers	Legacy utPay and ChainValley-era integrations; included only for succession context	Historical reference





## Annex B — Evidence Terminology

Tier	Meaning
<b>Established Fact</b>	Directly supported by primary records, public legal documents or an observed artifact whose relevant feature is visible.
<b>Strong Indicator</b>	A documented fact pattern strongly supporting an inference but not independently proving the ultimate proposition.
<b>Strong Hypothesis</b>	A cumulative, testable explanation supported by multiple indicators; expressly not treated as established fact.
<b>Open Question</b>	A material issue for which the current evidence is insufficient or authoritative confirmation is pending.

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